

Jon V. Swenson (SBN 233054)  
BAKER BOTTS LLP  
620 Hansen Way  
Palo Alto, CA 94304  
Telephone: (650) 739-7500  
Facsimile: (650) 739-7699  
Email: jon.swenson@bakerbotts.com

John M. Taladay (*pro hac vice*)  
Erik T. Koons (*pro hac vice*)  
Charles M. Malaise (*pro hac vice*)  
BAKER BOTTS LLP  
1299 Pennsylvania Ave., N.W.  
Washington, DC 20004-2400  
Telephone: (202) 639-7700  
Facsimile: (202) 639-7890  
Email: john.taladay@bakerbotts.com  
Email: erik.koons@bakerbotts.com  
Email: charles.malaise@bakerbotts.com

*Attorneys for Defendants Koninklijke Philips N.V. and  
Philips Electronics North America Corporation*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

**In re: CATHODE RAY TUBE (CRT)  
ANTITRUST LITIGATION**

This Document Relates to:

*Sears, Roebuck and Co. and Kmart Corp. v.  
Technicolor SA, No. 3:13-cv-05262;*

*Sears, Roebuck and Co. and Kmart Corp. v.  
Chunghwa Picture Tubes, Ltd., No. 11-cv-  
05514;*

*Sharp Electronics Corp., et al. v. Hitachi, Ltd.,  
et al., No. 13-cv-01173;*

*Sharp Electronics Corp. v. Koninklijke Philips  
Elecs., N.V., No. 13-cv-2776 SC;*

*Target Corp. v. Chunghwa Picture Tubes, Ltd.,*

Case No. 07-5944 SC

MDL No. 1917

**DECLARATION OF TIFFANY B.  
GELOTT IN SUPPORT OF  
KONINKLIJKE PHILIPS N.V.'S AND  
PHILIPS ELECTRONICS NORTH  
AMERICA CORPORATION'S  
ADMINISTRATIVE MOTION TO SEAL  
DOCUMENTS PURSUANT TO CIVIL  
LOCAL RULES 7-11 AND 79-5(d)**

Date: None set  
Time: 10:00 a.m.  
Place: Courtroom No. 1

Hon. Samuel Conti

*No. 11-cv-05514;*

*Target Corp. v. Technicolor SA, No. 13-cv-05686.*

1 I, Tiffany B. Gelott, hereby declare as follows:

2 1. I am an associate with the law firm of Baker Botts L.L.P., counsel for Defendants  
3 Koninklijke Philips N.V. and Philips Electronics North America Corporation (collectively, the  
4 “Philips Defendants”). I am a member of the bar of the District of Columbia and I am admitted to  
5 practice before this Court *pro hac vice*. I submit this declaration in support of the Philips  
6 Defendants’ Administrative Motion to Seal Documents Pursuant to Civil Local Rules 7-11 and  
7 79-5(d).

8 2. I have personal knowledge of the facts set forth herein and, if called upon, could  
9 and would competently testify thereto under oath.

10 3. On June 18, 2008, the Court issued a Stipulated Protective Order (Dkt. No. 306)  
11 (the “Stipulated Protective Order”).

12 4. Pursuant to the Protective Order and Local Civil Rules 7-11 and 79-5(d), the  
13 Philips Defendants seek to file the following documents or portions thereof under seal:

- 14 a. Portions of the Joint Defense Reply in Support of Motion in Limine #10:  
15 Motion to Exclude Evidence of Any Alleged CDT Price-Fixing Conspiracy  
16 (the “Reply”);
- 17 b. Exhibit 1 to Declaration of Tiffany B. Gelott in Support of the Reply  
18 (“Gelott Declaration”), the Expert Report of Alan S. Frankel, dated April  
19 15, 2014, regarding Sears and Kmart;
- 20 c. Exhibit 2 to the Gelott Declaration, the Expert Report of Alan S. Frankel,  
21 dated April 15, 2014, regarding Target;
- 22 d. Exhibit 3 to the Gelott Declaration, interrogatories responses from Sharp  
23 Electronics Corporation and Sharp Electronics Manufacturing Company of  
24 America, Inc.’s (collectively, “Sharp”) First Supplemental Responses and  
25 Objections to Defendants Hitachi Electronic Devices (USA), Inc. and  
26 Samsung SDI America, Inc.’s First Set of Interrogatories, dated February  
27 26, 2014;
- 28 e. Exhibit 4 to the Gelott Declaration, excerpts from the Deposition of Jerry

Hausman, dated July 23, 2014;

f. Exhibit 5 to the Gelott Declaration, the Expert Report of Jerry Hausman, dated April 15, 2014;

g. Exhibit 6 to the Gelott Declaration, a true and correct copy of a certified translation of a document produced by the Chunghwa Defendants with the bates number, CHU00028521E;

h. Exhibit 7 to the Gelott Declaration, a true and correct copy of a certified translation of a document produced by the Chunghwa Defendants with the bates number, CHU00028558E; and

i. Exhibit 8 to the Gelott Declaration, a true and correct copy of a certified translation of a document produced by the Chunghwa Defendants with the bates number, CHU00031111E.

5. The documents or portions of the documents submitted under seal contain either (a) material designated by Sharp, other Plaintiffs, or the Chunghwa Defendants pursuant to the Stipulated Protective Order (Dkt. 306, June 18, 2008) as “Confidential” or “Highly Confidential” or (b) an analysis of, references to, or information taken directly from material designated by Sharp pursuant to the Stipulated Protective Order as “Confidential” or “Highly Confidential.”

6. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge.

Executed on March 6, 2015 in Washington, DC.

/s/ Tiffany B. Gelott

Tiffany B. Gelott